

MRM:APW
F. #2021R01043

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JAN 13 2022 ★
LONG ISLAND OFFICE

UNITED STATES OF AMERICA

- against -

MARK VICARS,

Defendant.
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I N D I C T M E N T

Cr. No. **CR 22-26**
(T. 18, U.S.C., §§ 982(a)(6)(A)(ii), 1542
and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

HURLEY, J.

THE GRAND JURY CHARGES:

SHIELDS, M.J.

FALSE STATEMENT IN PASSPORT APPLICATION

1. On or about August 28, 2014, within the Eastern District of New York and elsewhere, the defendant MARK VICARS, with the intent to induce and secure the issuance of a passport under the authority of the United States for his own use and contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, did willfully and knowingly make false statements in an application for a passport, to wit: the use of a false place of birth.

(Title 18, United States Code, Sections 1542 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(6)(A)(ii), which requires any person convicted of such offense to forfeit any property, real or personal: (a) that constitutes, or is

derived from or is traceable to, the proceeds obtained directly or indirectly from the commission of such offense; and (b) that is used to facilitate, or is intended to be used to facilitate, the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(6)(A)(ii); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2021R01043
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MARK VICARS

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 982(a)(6)(A)(ii), 1542 and 3551 et seq.; T. 21,
U.S.C. § 853(p))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Andrew Wenzel, Assistant U.S. Attorney (718) 254-6466